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**BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH**

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APPLICATION OF ROCKY MOUNTAIN POWER )  
 )  
FOR APPROVAL OF A SOLICITATION PROCESS ) Docket No. 21-035-52  
 )  
FOR 2022 ALL-SOURCE REQUEST FOR PROPOSALS )

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**INITIAL COMMENTS OF THE INTERWEST ENERGY ALLIANCE**

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The Interwest Energy Alliance is a 501(c)(6) nonprofit trade association of renewable energy developers working with the western nongovernmental environmental advocacy community to promote renewable energy throughout the Intermountain West, including in Utah, Wyoming, Colorado, New Mexico, Arizona and Nevada. Interwest submits these comments in response to the Scheduling Order and Notice of Virtual Technical Conference issued on February 15, 2022.

As a proponent of higher levels of renewable energy and energy storage acquisitions to reduce greenhouse gas emissions and provide stable prices to consumers, Interwest supports PacifiCorp's issuance of the proposed 2022 All-Source Request For Proposals (RFP), but cautions the Commission that changes are warranted to ensure it will provide the most robust response and enable PacifiCorp to select the most cost-effective resources available on the market to be in-service to meet capacity and energy demand requirements throughout the Action Plan period identified in the 2021 Integrated Resource Plan (2021 IRP).

The changes we recommend to certain RFP requirements will ensure PacifiCorp is able to select the lowest cost resources from the most robust pool of bidders and options.

Interwest recommends the following revisions to make the RFP as competitive and fair as possible:

1. The commercial operation date (COD) for bids should be extended to December 31, 2028 for all resources, with bidders able to identify in which year their COD deadline falls.
2. Collocated renewable energy plus storage should not be limited to AC coupled storage resources but also include DC coupled storage resources.
3. PacifiCorp should allow at least two different configurations of bids per project site without requiring the bidder to pay bid fees for each bid.
4. Adjust selection criteria which tilt the scale towards benchmark and build-transfer projects.
  - a. Remove assigned terminal value to build-transfer agreement (BTA) and benchmark bids.
  - b. Remove production criteria and replace with availability criteria.
  - c. Clarify/modify the curtailment provisions.
  - d. Adjust price/non-price score ratio to 80/20.
5. Extend the right to terminate in the event of force majeure events to one year in pro-forma purchase power agreement (PPA).

## **I. INTERCONNECTION QUEUE DRIVING THE BID SELECTION**

The RFP bid review process timing and anticipated CODs as currently written create an expensive and risky timing mismatch between the interconnection queue study process and the RFP deadlines. In fact, the effect will be that opportunity for selection will be determined by transmission queue study position rather than competition on other factors, including cost. PacifiCorp's transition from a serial processing of its interconnection queue to a cluster-study approach, along with delays in Integrated Resource Plan (IRP) and RFP processing, has injected a timing mismatch which effectively makes queue position rather than low cost being a primary factor in the RFP selection process. Viable low-cost projects may be rejected early in the bid review process without an opportunity for full review. Interwest understands from the RFP instruments and related discussions<sup>1</sup> that PacifiCorp actually expects the vast majority of the new portfolio to be selected from projects with signed Large Generator Interconnection Agreements (LGIAs) or nearly complete queue study processes to be qualified and selected. This severely constrains the competitive nature of the requests for proposals, because selection criteria is so closely-linked to the completion of an LGIA. As a resolution, Interwest recommends that some competition and linkage between the interconnection study process and the RFP be injected back into the procurement process by extending the CODs for the pool of eligible bids.

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<sup>1</sup> See also and PacifiCorp's representations to the Oregon Public Utilities Commission, video recording of the presentation in Oregon PUC Special Public Meeting UM 2059, LC 77 and UM 2193, PAC 2022 All-Source RFP Commission Workshop Notice and Agenda [available at](https://www.oregon.gov/puc/news-events/Pages/default.aspx) under Oregon PUC events page, found at <https://www.oregon.gov/puc/news-events/Pages/default.aspx>.

As proposed in the RFP documents, the COD deadline for wind and solar projects is constrained under to the 2025 or 2026 time frame (no later than 12/31/2026), while longer lead-time projects can select a 2028 COD. Bids are to be submitted this Spring, although bid review results are not going to be available until Q1 2023, with final short-list results in May 2023. This raises several issues, which will likely effectively eliminate large numbers of potential projects from selection, even those in fairly advanced stages of development. This mismatch eliminates the ability for developers to determine whether their project is likely to be successful through initial short list selection based on other factors besides transmission before they must invest millions of dollars and place at risk substantial levels of investment in the interconnection study processes. This pattern is contrary to the proposed benefits of a cluster study process approved under PacifiCorp's queue reform, and will take years to resolve under PacifiCorp's proposed RFP process.

As proposed, bidders must be in the transitional cluster, Cluster 1 (2021) or Cluster 2 (2022) or have an executed LGIA to be eligible for the RFP. While these clusters are likely to be well-populated, very few projects requiring network upgrades could still achieve a 2026 COD because of the time required to complete the upgrades. The vast majority of Cluster 1 resources will not be able to meet the COD deadlines, particularly PacifiCorp East (PACE) projects. Cluster 1 transmission interconnection study results came out in October 2021 and 41 projects in Areas 1, 2, 3, 5, 6, 7 and 12 (WY, ID, UT and Southern OR) will not be able to achieve COD before 12/31/2026 because the timeline to build network upgrades in these areas at this time is often 60 months or more after the LGIA is executed. Cluster 2 (2022) projects will face the same impediments. Due to this short timeline, it is highly likely that only projects with existing LGIAs and those approaching completion of the interconnection study process will be successful in the RFP, because the others will be eliminated for inability to meet the transmission upgrade timing requirements.

The remedy for the RFP timing concern is simple and straightforward. PacifiCorp could extend the in-service deadline to allow bidders to specify whether they are able to be in commercial operation status by the end of 2025, 2026, 2027 or 2028. These modifications would allow bidders to have more information about their prospects for each project before committing to the entire queue study process and would eliminate the potentially discriminatory misalignment between traditionally shorter lead time and longer lead time resources. Projects with executed LGIAs will be incentivized to choose earlier CODs to compete for the opportunity to meet PacifiCorp's demand requirements. This extension will still enable PacifiCorp to select viable bids which have sufficient time to complete required transmission upgrades.

As stated in the Commission order approving PacifiCorp's 2017 RFP for new wind resources, issued in Docket 17-035-23,<sup>2</sup> Open Access Transmission Tariff (OATT) issues are the exclusive domain of the Federal Energy Regulatory Commission (FERC). However, the Utah Commission has authority over the RFPs issued by PacifiCorp, and should, to the greatest extent

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<sup>2</sup> Docket No. 17-035-23, *Order Approving RFP With Suggested Modification*, issued Sept.22, 2017. Available at <https://psc.utah.gov/2017/04/18/docket-no-17-035-23/>.

possible, help PacifiCorp create an RFP process that works in harmony with the OATT process rather than having the effect of rendering large numbers of bids ineligible under the solicitation requirements unless they have a near-final or executed LGIA.

For future RFPs, Interwest would like to work with PacifiCorp and stakeholders to figure out a way to better integrate the RFP and interconnection processes to assure a more equitable and competitive result. A regular “pendulum” pattern of RFPs issued every two years (which is supported by the utility) with bid review results<sup>3</sup> to be published earlier in the cluster study process would significantly resolve the mismatch and provide predictability to developers investing millions of dollars into multi-year development projects critical to providing low-cost power.

Interwest recommends this pattern be memorialized in the Commission’s orders approving the RFPs and IRPs. A predictable timeline can reduce overall costs by allowing bidders to plan ahead with less risk. Most importantly, it will allow cost-effective bids to be selected and to advance where appropriate rather than becoming lost opportunities due to preemption of the bid review process by the interconnection study process. Preferably, PacifiCorp would issue the RFP early enough so that initial short-list results would be available to bidders in April or May when the cluster study process is just getting underway. This would run the bid review process more in parallel with the cluster study process each year, while providing bidders with initial responses to their bids sufficient to enable them to make the multi-million dollar decisions as they proceed through the initial study phase into the facilities study phase. Increasing transparency for bidders can enable them to make more informed business decisions, reducing costs and risks as they take each major step towards commercial readiness. Ultimately, more accurate signals from the market can reduce overall costs which are passed on to customers. As indicated, Interwest would appreciate an open discussion about this timing going forward, either through a workshop or informal discussion between the utility and stakeholders engaged in the transmission planning and RFP review process in Utah.

## **II. DC COUPLING OF COLLOCATED STORAGE SHOULD BE ALLOWED IN ADDITION TO AC COUPLING**

PacifiCorp is proposing that only AC coupled collocated storage be eligible for inclusion in the RFP. This equipment restriction injects substantial losses from converters and inverters that may reduce the overall efficiency of the projects and increase costs. As noted in the Commission Order approving PacifiCorp’s 2020 All Source RFP issued in Docket No. 20-035-05,<sup>4</sup> Utah Admin. Code R746-420-3(1)(b)(iii)-(v) provides that solicitations must be “sufficiently flexible,” “designed to solicit a robust set of bids to the extent practicable,” and “commenced sufficiently in advance of the time of the projected resource need to permit and facilitate ... a reasonable evaluation of resource options that can be available to fill the projected need.” From Interwest’s

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<sup>3</sup> See Response to Interwest Data Request Set 1, including 1.11(b), attached as Exhibit A to these comments.

<sup>4</sup> Docket No. 20-035-05, *Order Approving 2020 All Source RFP*, issued July 17, 2020, at 7. Available at <https://psc.utah.gov/2020/01/24/docket-no-20-035-05/>.

perspective, this inflexibility is unwarranted and will restrict evaluation of reasonable resource options.

PacifiCorp explains the rationale behind this requirement as follows:

Q: Related to the exclusion of DC-coupled solar = battery storage resources from the RFP, the RFP currently only allows AC-coupled hybrid resources. Could you please provide a rationale for this exclusion in light of the significant cost savings, recapture of clipped energy and other synergistic benefits of deploying hybrid resources in a DC-coupled setting?

A: CORRECTED: Due to CAISO metering requirements and the lack of utility-grade, ANSI-approved revenue-quality AC-meters not being available at the current time, potential contractual complications associated with the distributed nature of DC AC coupled battery systems, and PacifiCorp's goal of managing the dispatch of energy storage, PacifiCorp will accept only AC-coupled collocated battery systems in this RFP. PacifiCorp may lift the restriction in the future as metering technology and standards further evolve. Different developers have proposed AC-coupled systems that are cost competitive and many see the construction and operational benefit of a central battery storage system that AC-coupled systems afford.<sup>5</sup>

Revenue-grade DC meters will likely be available by the time PacifiCorp conducts its RFP bid review modeling and analysis, and certainly by the time any project selected goes in-service. While CAISO metering requirements do not currently identify specific utility-grade, ANSI-approved revenue-quality DC meters, these meters are now readily available on the market (specifically Accu Energy's DC 243 and Itron's ACE6000), and CAISO is in the testing stages. These settlement-quality DC meters are capable of providing bi-directional current and voltage measurements (with 0.5% accuracy) in front of solar and battery storage systems. Based on our conversations with experts who have discussed this issue with CAISO metering staff (and as discussed briefly during the Utah technical conference), CAISO expects to update its metering requirements and business practice manual well in advance of the January 2023 deadline for market bids to accommodate these updates.

PacifiCorp noted in both the Oregon Commission's workshop and Utah Commission's technical conference that it is currently not capable of handling DC coupled solar plus storage contracts due to increased complexity and higher "lowest cost of energy (LCOE)" values compared to AC coupled systems. These commercial, rather than technical, reasons from PacifiCorp do not seem to Interwest to be adequate grounds to restrict potentially competitive bids from participating in the RFP.

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<sup>5</sup> See PacifiCorp's 2022AS RFP webpage, Questions and Answers, available at <https://www.pacifiCorp.com/suppliers/rfps/2022-all-source-rfp.html>. Last accessed on March 13, 2022

DC coupled systems, despite increased metering requirements, may be able to provide cost synergies due to increased energy available for storage capture, increased efficiency due to lower inversion and conversion losses, and capital cost reductions due to potentially shared DC-AC inverters.

Multiple meters, in and of themselves, should not be understood as a valid reason to deny DC coupling for collocated systems. It is Interwest's understanding that all meters are read through a SCADA system that is capable of handling very large numbers of inputs. Even if manual meter reading were utilized for these systems, the increased roundtrip efficiency of DC coupled systems could outweigh any theoretical increase in costs. Since PacifiCorp did not model DC coupled solar plus battery storage resources as an explicit supply-side option in its portfolio modeling, Interwest understands that there may be additional complexity in integrating these resources' technical characteristics, but that issue could be remedied by consulting external technical experts including national labs such as the National Renewable Energy Laboratory (NREL). Interwest strongly recommends that the RFP should be revised and PacifiCorp should be prepared to accept DC coupled projects.

### **III. BIDDERS SHOULD BE ALLOWED TO RESPOND WITH TWO BIDS FOR EACH SITE, WITH TWO DIFFERENT BUSINESS MODELS**

The efficiencies of allowing two bids for one bid price will allow more potential projects to be considered. Interwest understood that PacifiCorp representatives acknowledged that they are able to model these alternatives without undue difficulty at the Utah Commission technical conference.

Interwest recommends that the 2022AS RFP requirements be revised so that when a bidder proposes both a BTA and PPA as alternatives for a particular project, that this be considered alternative versions of the same bid. This modification would allow the two different business models to be matched up and compared to one another, for cost-comparison purposes. Interwest recommends that alternatives be allowed under one bid fee because it allows for a direct comparison between the two types of business models. BTA projects place the costs and risks of operation on the utility where PPAs generally put these costs and risks on the developer. This also reduces the possibility that any inherent bias is "baked-in" to the bid review in favor of utility ownership under a BTA. Under Utah Admin. Code Rule R746-420-3(1)(b)(ii), the primary goal of an RFP should be to allow for cost and risk comparisons, and Interwest believes that this modification would help reach that goal. The RFP should be revised to allow two alternative business models to be submitted as part of the same bid, under one base bid fee.

#### **IV. BID REVIEW IS TILTED TOWARDS BENCHMARK AND BUILD TRANSFER PROJECTS**

As noted in the *Order Approving 2020 All Source RFP* at page 16, issued on July 17, 2020,<sup>6</sup> the Commission recognized “the importance of ensuring that RMP evaluates PPAs and BTAs in a fair and reliable manner that fully accounts for any unique risks, benefits, and other distinct attributes associated with each contract structure.” Interwest’s recommendations are intended to enable the RFP to comply with this goal and to eliminate inherent imbalance in the RFP requirements which tilt the scale towards benchmark or BTA projects, without delaying the bid review process.

PacifiCorp proposes to submit up to 31 benchmark projects into this RFP evaluation totaling 6,847 MW of wind solar and storage (per Appendix O RFP umbrella document). As noted above, the proposed bid requirements and bid review process may tilt the scale towards benchmark and BTA projects as opposed to PPAs. While Interwest supports all types of business models including utility owned BTA projects, we support them all to be acquired through fair and robust competitive solicitations. Interwest also promotes a balanced mix in the final portfolios selected for ongoing investments to provide service to customers.

It is important to note that there is an inherent asymmetrical performance risk differential between PPAs versus benchmark and BTA projects. Developers of PPA projects must factor in future contingencies, maintenance, required upgrades, and operating costs into their PPA bid price. Benchmark and BTA projects do not directly carry that risk in their original bid price. Once ownership is transferred to the utility, ratepayers are responsible for these same contingencies, including potential increases in maintenance, required upgrades, and operating costs. Interwest recommends benchmark and BTA projects include some conservative contingency costs to more fully compare actual costs and risks to ratepayers. There is also some inherent bias in the cluster study process because PPA bids will have to pay the fees to prove commercial readiness (OATT Section 38.4) that benchmark bids likely can avoid if they have a clearer line of site to selection. PPA bids will also be subject to higher queue withdrawal penalties whereas benchmark resources will not (either through avoiding the penalties associated with commercial readiness deposits or because the clearer line of site to selection in the bid review RFP process will allow them to avoid escalating withdrawal fees) (OATT Section 38.7).

a. The RFP assigns a speculative terminal value to BTA projects and benchmark bids. To allow a fair comparison, the RFP should be modified so that PacifiCorp will not assign a terminal value to BTA projects and benchmark bids, or the RFP must allow PPA bids to elect to achieve an equal score improvement with reasonable PPA renewal provisions. Interwest’s preference is that PacifiCorp not be allowed to assign a terminal value to BTA projects and benchmark bids.

b. Interwest recommends modification of provisions in PacifiCorp’s Form PPA which place unreasonable risk on generators due to the normal variability of renewable energy and widespread weather patterns which may result in lower than normal production from the same

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<sup>6</sup> See full citation in fn. 3, *supra*.

equipment and project design. Specifically, the proposed Form PPA requires a performance guarantee of 90% of expected output. Expected output is based on initial projections, which are also used to obtain financing for a project. If this performance metric is not achieved in commercial operation over the time periods established in the PPA, PacifiCorp has an option to terminate the PPA or receive financial penalties. These penalties apply even if the reduced production were due to uncontrollable variation in the weather which may be affecting all variable energy projects within a region, rather than being the result of failure of equipment and design of a specific project to operate as planned. Renewable project developers do not control the weather; rather, they design and build projects to produce as much zero fuel costs energy as possible from the variable inputs. Production guarantees which are based on widespread weather events rather than the efficiency of a particular project to perform pursuant to specifications increase overall risks based on factors outside of a project developer's control. This production guarantee may pose serious challenges for projects to obtain financing, raising costs and risks. An availability guarantee, on the other hand, would only hold a PPA accountable for factors within their control, such as equipment operations and maintenance. If a least-cost, least-risk resource is selected but cannot be financed, the project will not be built, and customers will not receive its benefits. Interwest recommends replacing the production guarantee with an availability guarantee, which would only hold PPAs accountable for the factors that are within their control.

c. Curtailment is another area where PPA bidders face more risks and costs compared to benchmark and BTA project bids. It will be difficult for PPA bidders to estimate losses from non-compensable curtailment and to factor such losses into bids when the grounds for non-compensable curtailment include "(b) the Market Operator, Network Service Provider or Transmission Provider directs a curtailment, reduction, or redispatch of generation in the area of the Facility (which would include the Net Output) for any reason;" because these factors are solely within the grid operator's control. Nevertheless, PPA bidders will have to assume some uncompensated curtailment and reflect that in pricing. BTA projects and benchmark bids will not face those same costs, nor will they need to factor those costs into bids.

In addition, PacifiCorp requires bidders to redline any exceptions to the pro-forma terms and conditions of the PPA. Therefore, PacifiCorp should provide greater clarity upfront regarding the cause and compensation associated with curtailment. Section 4.5.1 of Exhibit K of the pro-forma PPA sets terms for non-compensable curtailment which include "the Market Operator, Network Service Provider or Transmission Provider directs a curtailment, reduction, or redispatch of generation in the area of the Facility (which would include the Net Output) for any reason." This offers a very broad opportunity for non-compensated curtailment which should be clarified and narrowed. Further, section 4.5.2 describes a process for limiting compensable curtailment quantities which is confusing and creates uncertainty for bidders regarding expected compensable versus non-compensable curtailment quantities. This section seems to imply that 5% of expected annual output will automatically be deemed non-compensable curtailment. If this is the case, PacifiCorp should state this term plainly. Depending on the clarification, Interwest may have other comments about this clause, so Interwest will request the opportunity to reply to PacifiCorp's response to these comments.



d. Finally, the Commission should require PacifiCorp to use a price/non-price score ratio of 80/20 instead of 75/25 as currently proposed. PacifiCorp's non-price factors are inherently subjective and inject an opportunity to bias the evaluation of bids. The non-price factors also limit the Independent Evaluator and the parties from applying, understanding, or relying on a quantitative analysis. Non-price factors should be reduced because of this potential bias in results. Interwest believes that non-price factors could be more limited and targeted toward the less subjective scoring components, thus reducing the 75/25 to an 80/20 scorecard.

## **V. REJECT RIGHT TO TERMINATE FOR FORCE MAJEURE EVENTS WHICH ARE RESOLVED WITHIN ONE YEAR**

Interwest recommends that the Commission reject the proposed term in the RFP documents which allow PacifiCorp to terminate its offer or contract with a developing project which has been included in the modeling of final portfolios from further consideration if a force majeure event lasts 180 days. Rather, Interwest recommends this right be reserved only for force majeure events lasting for 12 months or more. Delays due to the Covid-19 pandemic or other market-wide disruptions in equipment or labor supplies are likely to affect all developing projects, so PacifiCorp is not likely to reduce risks to customers by replacing a project delayed by force majeure and selecting another project waiting in the wings. While the pandemic and its effects on key global supplies is resolving, resolution is often requiring a bit more time. Overall, increased renewable energy development activity around the country places pressure on labor and equipment supplies, reducing flexibility to address true force majeure events. While not unusual in ordinary times, application of this provision could result in severely penalizing a well-developed project which is experiencing these market-wide disruptions, after millions of dollars are invested over a period of years. Therefore, Interwest recommends this term be rejected unless the delay lasts one year or more.

As stated above, Interwest recommends the following changes to make the RFP more competitive and to enable PacifiCorp to select the most cost-effective projects to serve its customers:

1. The COD for bids should be extended to December 31, 2028 for all resources, with bidders able to identify in which year their COD deadline falls.
2. Collocated renewable energy plus storage should not be limited to AC coupled storage resources but also include DC coupled storage resources.
3. PacifiCorp should allow at least two different configurations of bids per project site without requiring the bidder to pay bid fees for each bid.
4. Adjust selection criteria which tilt the scale towards benchmark and BTA projects.
  - a. Remove assigned terminal value to BTA agreement and benchmark bids.
  - b. Remove production criteria and replace with availability criteria.
  - c. Clarify/modify the curtailment provisions.
  - d. Adjust price/non-price score ratio to 80/20.
5. Extend the right to terminate in the event of force majeure events to one year in pro-forma purchase power agreement (PPA).

Respectfully submitted on March 14, 2022,

INTERWEST ENERGY ALLIANCE

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**On Behalf of Interwest Energy Alliance**

### **Interwest Data Request 1.11**

- (a) Is PacifiCorp capable of modeling the bid responses for bid review purposes if the commercial operation date (COD) deadlines in the 2022AS RFP were changed to allow bidders to specify CODs of 12/31/26, 12/31/27 and 12/31/28, at their option, regardless of technology, either a) in their sole discretion or b) under other conditions which may reasonably be imposed by PacifiCorp. If not, why not?
- (b) Please include in your analysis the assumption that PacifiCorp could provide scoring incentives to motivate bidders to respond with sufficient bid capacity and energy to meet PacifiCorp's demand requirements in each year. Please list and describe generally conditions under which these alternative scenarios could be able to be modeled for bid review purposes.

### **Response to Interwest Data Request 1.11**

- (a) Conditionally, yes. However, commercial operation date (COD) modification would have to align with applicable PacifiCorp Transmission interconnection studies to assure the correct network upgrade costs and interconnection timing constraints are aligned. PacifiCorp maintains the appropriateness of its 2026 COD requirement for several reasons:
  - (1) First, the 2022 All Source Request for Proposals (2022AS RFP) results from the resource need identified in PacifiCorp's 2021 Integrated Resource Plan (IRP) process and is focused on an action plan through 2026. In other states (such as Washington), competing regulations are specifically focused on a Clean Energy Implementation Plan (CEIP) action plan window through 2025.
  - (2) Second, the farther out in time bidder's price their bids, the more risk there is associated with the cost curve assumptions. Customers may miss out on greater than expected cost declines. Customers may also be at risk if a bidder is not able to meet its commitments because of price increases due to this proposed extended timeframe.
  - (3) Third, nearer term bidders are likely to have more mature bids with higher likelihood of viability and deliverability.
- (b) PacifiCorp does not support scoring incentives as suggested. As both discussed in the Company's response to subpart (a) above, and stated in numerous workshops and filings to-date, PacifiCorp will likely be issuing RFPs every two years in support of new IRPs. The expected frequency of RFPs provides bidders ample opportunity to provide more mature projects, both from a development and interconnection perspective while mitigating the concerns discussed in the Company's response to subpart (a) above

CERTIFICATE OF SERVICE  
Docket No. 21-035-52

I hereby certify that on March 14, 2022, a true and correct copy of the foregoing was served by email to the following addresses:

<p>ROCKY MOUNTAIN POWER Data Request Response Center (<a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a>) Utah Dockets <a href="mailto:Utahdockets@pacificorp.com">Utahdockets@pacificorp.com</a> Jana Saba <a href="mailto:Jana.saba@pacificorp.com">Jana.saba@pacificorp.com</a> Joelle Steward <a href="mailto:Joelle.Steward@pacificorp.com">Joelle.Steward@pacificorp.com</a> Emily Wegener <a href="mailto:Emily.Wegener@pacificorp.com">Emily.Wegener@pacificorp.com</a> Stephanie Barber-Renteria <a href="mailto:stephanie.barber-renteria@pacificorp.com">stephanie.barber-renteria@pacificorp.com</a></p>	<p>DIVISION OF PUBLIC UTILITIES Patricia Schmid (<a href="mailto:pschmid@agutah.gov">pschmid@agutah.gov</a>) Justin Jetter (<a href="mailto:jjetter@agutah.gov">jjetter@agutah.gov</a>) Chris Parker <a href="mailto:chrisparker@utah.gov">chrisparker@utah.gov</a> William Powell <a href="mailto:wpowell@utah.gov">wpowell@utah.gov</a> Madison Galt <a href="mailto:mgalt@utah.gov">mgalt@utah.gov</a> <a href="mailto:dpudatarequest@utah.gov">dpudatarequest@utah.gov</a></p>
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